

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

LMMC, LLC,)	
)	
Plaintiff,)	Case No. 1:23-cv-00950
)	
v.)	Hon. Charles P. Kocoras
)	
CALCIUM LLC,)	
)	
Defendant.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendant Calcium LLC (“Defendant”), by and through its attorneys, the Law Offices of Konstantine Sparagis, P.C., submit this Unopposed Motion for Extension of Time to Answer or Otherwise Plead. In support of its motion, Defendant states as follows:

1. This matter was initiated by LMMC, LLC (“Plaintiff”) on February 15, 2023.
2. Defendant was served with the summons and complaint on April 26, 2023, and its answer or other pleading was due on May 19, 2023.
3. Defendant hired and retained counsel on June 1, 2023.
4. Defendant is seeking additional time to answer or otherwise plead, by July 7, 2023 which is slightly extended due to the intervening holiday on July 4, 2023.
5. This extension is sought in order for defense counsel to obtain additional information to frame the responsive pleading for defendant, which may include motions to dismiss.
6. Defendant’s counsel as conferred with Plaintiff’s counsel who indicated that they are not contesting this motion for extension.
7. This is the first request for extension by Defendant.
8. The extension of deadline for Defendant to file its responsive pleading will not prejudice any party. There are no other pending motions.

9. There is a status date set by the Court for June 20, 2023 which the Defendant would request be continued to a date following July 7, 2023.

WHEREFORE, for the reasons set forth above, Calcium LLC respectfully requests the Court to grant its Unopposed Motion for Extension of Time to Answer or Otherwise Plead, and for any further relief the Court deems appropriate.

Respectfully submitted,

Calcium LLC

/s/ Konstantine Sparagis

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